

CLOSURE PLAN
(WITH ADDENDUM)

Submitted to

SPRAY PRODUCTS CORPORATION
P.O. Box 737
Norristown, Pennsylvania 19404

February 1984

EMCON Associates
1455 Schuylkill Road
Pottstown, PA 19464
Project 440-01.01

SPRAY PRODUCTS CORPORATION

CLOSURE PLAN

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1.0 Introduction

1.1 General

This plan describes the closure of the Spray Products Corporation facility in Plymouth Township, Montgomery County. The closure plan outlines the steps for decontamination of the facility.

A schedule for the closure of the facility is presented in Section 6.0.

Spray Products Corporation will provide a closure certification by an independent registered professional engineer stating that the facility has been finally closed in accordance with the closure plan.

1.2 Scope and Objective

In accordance with regulations promulgated under the Resource Conservation and Recovery Act (RCRA) and the Pennsylvania hazardous waste regulations in Chapter 75, Spray Products Corporation is developing a detailed closure plan for its Plymouth Township facility. One stated purpose of these regulations is to ensure that all hazardous waste management facilities are closed in a manner that:

- ° Minimizes the need for further maintenance.
- ° Controls, minimizes or eliminates, to the extent necessary to prevent threats to human health and the environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall or waste decomposition products to the ground or surface waters or to the atmosphere. (40 CFR 264.111)

1.3 Federal and State Regulatory Requirements

The closure plan of a hazardous waste site is subject to specific regulations. The plan must include a description of how and when the facility will be closed, including the steps necessary to completely or partially close the facility at any point during its intended operating life. Additional elements required in the plan are:

- ° Estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility.
- ° Description of steps needed to decontaminate the facility equipment during closure.
- ° Estimate of the expected year of closure and a closure schedule, including itemization of activities which will allow tracking of the progress of closure.
- ° Notification to the Environmental Protection Agency (EPA) Regional Administrator at least 180 days prior to initiation of closure.
- ° Decontamination steps at the end of closure for all equipment used during closure.
- ° Certification by owner or operator and by an independent, registered, professional engineer that facility has been closed in accordance with the closure plan.

During the lifetime of the facility, the owner or operator is required to amend the plan whenever changes in operating plans or facility design affects the plan or whenever there is change in the expected year of closure. Additionally, the owner or operator should start closure

within thirty (30) days after receipt of the final volume of waste and must complete closure activities within 180 days after receiving the final volume of waste.

2.0 Facility Description

Spray Products Corporation operates a small hazardous (ignitable) waste storage facility at its Plymouth Township plant.

The facility is located on an approximately seven-acre tract of land in Plymouth Township northwest of Conshohocken, just off Conshohocken Road. Access to the site is only from Conshohocken Road. The site is bounded by the Penn Central Railroad on the south, Ridge Pike to the east, Conshohocken Road to the west and private business to the north. The area immediately surrounding the plant is in industrial and manufacturing useage.

Spray Products Corporation is a packager of automotive and industrial chemical specialties and aerosol paints. In their packaging process, they generate "dirty" wash solvent from their clean-up operation. This "dirty" paint solvent is stored in drums for pick-up in a tank wagon by a solvent reclaimer. The yield of "clean" solvent is then recycled.

The plant operations require only a small storage area where drums of dirty wash solvent are stored. The storage area is on top of a concrete slab and has a small berm which will prevent any spillage or leaks from leaving the pad. The storage facility is located in an area where run-on will not occur. Run off from the facility is collected and stored in drums prior to being disposed of at an approved facility.

3.0 Storing, Disposing, Removing Inventory

The waste storage area is designed to be a waste storage area only for wastes. Waste is stored in this area only in drums. At any time, the maximum waste quantity will consist of twenty drums of recoverable solvent waste.

Disposal of the inventory will be accomplished by selling the liquid solvent for fuel and/or reprocessing at an approved off-site facility.

4.0 Decontaminating the Facility

It is expected that decontamination will be required for the following:

- ° Storage pad and berm
- ° Equipment

Decontamination of facility equipment will occur concurrent with the final processing operation. Waste associated equipment will have served its useful life by this time, and will be dismantled and disposed of off-site or decontaminated with high pressure water. Any solid residues and/or solvent contaminated water will be disposed of off-site.

Decontamination of the storage pad and berm will primarily involve the following steps:

- ° Pad sweeping and collection of solid residues
- ° Steam washing of pad and berm and collection of liquid residues
- ° Rinsing of pad and collection of liquid residues with caustic and hydrochloric acid

Residue from the decontamination process will be both solids and liquid. The solid waste will be the larger pieces of waste and processed material hydroblasted or scraped from the equipment or structural items. This solid waste residue can be sent off site for disposal.

The liquid waste will be the result of the direct hose-spray cleaning of the equipment and pad areas. These waters will be contained in the storage area, collected and shipped to an off-site liquid treatment facility.

5.0 Closure Certification

Upon completion of final closure of the facility, an independent registered professional engineer will perform a final inspection of the facility to verify and certify that the area has been closed in accordance with the approved closure plan.

During the closure activities, the site will be secure using the same fencing and controlled access methods which have been used during the active life of the facility. Prior to final closure, the fence will be thoroughly inspected to insure good condition. Repairs will be made where necessary.

6.0 Schedule of Final Closure Activities

The following schedule includes the approximate time allowed for each step by the regulations of the Pennsylvania DER and the EPA. It is anticipated that facility final closure should be completed ahead of schedule; however, sufficient time is included to address unanticipated problems.

The final closure period begins on the date the last load of waste leaves the site and extends through to the date when completion of final closure is anticipated and when closure is officially certified by a registered professional engineer.

It is estimated that, based on a twenty year projected life, the Spray Products Corporation facility will begin closure activities in 2003. This date may be revised, based upon periodic updates of this plan and the level of activities at the site. Spray Products Corporation will notify the DER and EPA at least 180 days prior to the initiation of closure activities.

Submit closure plan	February 1984
Receive approval for plan	August 1984
Receive final volume of waste	01 01 2003
Remove all waste	04 01 2003
Begin decontamination procedures	04 01 2003
Final closure	07 01, 2003

7.0 Closure Costs

1. Decontaminate Storage Pad

Wash with dilute caustic soda and hydrochloric acid and haul neutralized liquid to Chem Clear, Inc. for final disposal

Estimated Cost: Chemicals	\$ 1,800
Hauling	250
Disposal	250
Manpower: 2 man days at \$300 per day	<u>600</u>
	\$ 2,900

2. Decontaminate Equipment

Estimated Cost: Chemicals	\$ 1,800
Hauling	250
Disposal	250
Manpower: 2 man days at \$300 per day	<u>600</u>
	\$ 2,900

3. Full Drums

20 maximum estimated on site at any one time

Disposal: 20 solvent drums at \$12 each	\$ 240
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4. Empty Uncontaminated Drums (income)

Resell to drum reconditioner: 20 drums at \$3.60 each	\$ (72)
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5. Maintenance Costs

Fence and security \$ 1,200

6. Engineering and Certification \$ 3,000

\$10,168

The closure costs shall be updated annually within thirty days after each anniversary of the first estimate by utilizing the following formula:

° First adjustment:

$$(\text{Closure Cost Estimate}) \times (\text{Inflation Factor}) = \text{Adjusted Closure Cost}$$

$$\text{Inflation Factor} = \frac{\text{Latest Implicit Price Deflator}^*}{\text{Previous Year Implicit Price Deflator}}$$

° Subsequent adjustments:

$$(\text{Latest Adjusted Closure Cost Estimate}) \times (\text{Latest Inflation Factor})$$

* Survey of Current Business, Implicit Price Deflator for Gross National Product, U. S. Department of Commerce



PRODUCTS CORPORATION

HOME OFFICE

P.O. BOX 737
NORRISTOWN, PENNSYLVANIA 19404
TELEPHONE 215-277-1010 CABLE: SPRAYCO

March 14, 1985

Mr. James A. Dolan
Hazardous Waste Coordinator
Commonwealth of Pennsylvania
Department of Environmental Resources
Bureau of Solid Waste Management
520 East Broad Street
Bethlehem, PA 18018

RE: Closure Plan for Hazardous Waste Management
Facility - PAD 042716084
Addendum #1

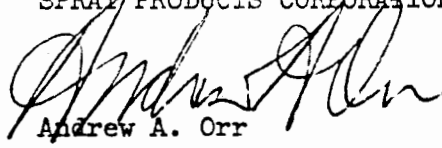
Dear Mr. Dolan:

As requested in your letter of February 28, 1985, the following addendum is being made to our Closure Plan:

1. Section 4.0 - "Rinse water from the decontaminate will be analyzed and submitted to DER for approval."
2. Section 7.0(6) - "Analysis of Rinse Water - \$500."

Sincerely,

SPRAY PRODUCTS CORPORATION


Andrew A. Orr
President

AAO/lmw

cc: Emcon Associates - Project #440-01.01
1455 Schuylkill Road
Pottstown, PA 19464



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES



Bethlehem District Office
Bureau of Solid Waste Mgmt.
520 East Broad Street
Bethlehem, PA 18018
861-2070

February 28, 1985

RE: Closure Plan for Hazardous Waste
Management Facility
PAD 042716084

Mr. Andrew Orr, President
Spray Products Corporation
P. O. Box 737
Norristown, Pennsylvania 19404

Dear Mr. Orr:

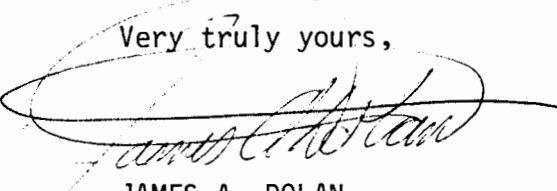
The referenced closure plan submitted by EMCON Associates of Pottstown, on your behalf, has been reviewed. Before final approval can be given, the following information is required:

1. Affirmation that the final rinse water from the decontamination process will be analyzed and submitted to the Department for approval.
2. The cost estimates for the above analysis.

Upon submission of the above information, the plan will be deemed approved. Since this plan is for a future closing, it will be kept on file in accordance with §75.265(o)(5)(i) of the Hazardous Waste Rules and Regulations. When this plan becomes active, the time constraints and other provisions of §75.265(o) must be complied with.

If you have any questions or if I can be of further assistance, do not hesitate to call me.

Very truly yours,



JAMES A. DOLAN
Hazardous Waste Coordinator

JAD:mln

cc: Field Supervisor
: U. S. EPA Code 3HW31
: Div. of Hazardous Waste Mgmt.

RECEIVED

MAR 01 1985

SPRAY PRODUCTS CORP.